

1 KAREN L. HANKS, ESQ.
Nevada Bar No. 9578
2 E-mail: karen@hankslg.com
HANKS LAW GROUP
3 7625 Dean Martin Drive, Suite 110
Las Vegas, Nevada 89139
4 Telephone: (702) 758-8434
Attorneys for Plaintiff
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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 HILLCREST INVESTMENTS, LTD., a
Canadian Corporation; AMERGOSA
9 ENTERPRISE, LLC.,

10 Plaintiffs,

11 vs.

12 AMERICAN BORATE COMPANY, a foreign
corporation; AMERICAN BORATE
13 COMPANY of Texas, a foreign corporation;
STATE ENGINEER, STATE OF NEVADA;
14 DEPARTMENT OF CONSERVATION AND
NATURAL RESOURCES, DIVISION OF
15 WATER RESOURCES, a Nevada Political
Subdivision; RAMM CORPORATION, a
16 Nevada Corporation; UNITED STATES FISH
AND WILD SERVICE, a division of the
17 UNITED STATES; NATIONAL PARK
SERVICE, a division of the UNITED
18 STATES; DOES I – V; and ROES VI – X,

19 Defendants.
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Case No. 2:21-cv-00964-RFB-NJK

**STIPULATION AND ORDER TO
EXTEND DEADLINE FOR
HILLCREST INVESTMENTS, LTD.
TO FILE RESPONSE TO
DEFENDANTS' AMERICAN BORATE
COMPANY AND AMERICAN BORATE
COMPANY OF TEXAS' RENEWED
MOTION FOR SANCTIONS**

(EIGHTH REQUEST)

21 Plaintiff, HILLCREST INVESTMENTS, LTD. ("Hillcrest") and Defendants,
22 AMERICAN BORATE COMPANY AND AMERICAN BORATE COMPANY OF TEXAS
23 (collectively "American Borate") hereby stipulate and agree as follows:

24 Pursuant to the Court's Order approving the Seventh Stipulation for Extension of Time
25 (ECF No. 80), the current deadline for Hillcrest to respond to American Borate's renewed motion
26 for sanctions is October 14, 2022. Hillcrest's counsel, Karen L. Hanks, and Defendants' counsel,
27 Debbie Leonard, have been diligently communicating about settlement and have exchanged initial
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1 settlement offers, and counter-offers, with the latest offer being made on October 7, 2022.
2 Hillcrest's counsel requires additional information regarding one term of the counter-offer, which
3 Hillcrest is working on getting, and time to present the offer to her client. As a result, the parties
4 agree to extend Hillcrest's response deadline to November 4, 2022.

5 The parties do not seek this extension to cause delay or to prejudice any party.

6 Dated this 13th day of October, 2022.

7 **HANKS LAW GROUP**

LEONARD LAW, PC

8
9 /s/ Karen L. Hanks

Karen L. Hanks, Esq.

Nevada Bar No. 9578

7625 Dean Martin Drive, Ste 110

Las Vegas, Nevada 89139

Attorneys for Plaintiffs

/s/ Debbie Leonard

Debbie Leonard, Esq.


Nevada Bar No. 8260

955 South Virginia Street, Ste 220

Reno, Nevada 89502

*Attorney for American Borate Company and
American Borate Company of Texas*

15 **IT IS SO ORDERED.**

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19 **RICHARD E. BOULWARE, II**
20 **United States District Court**

DATED this 17th day of October, 2022.